

WELCOME AND OVERVIEW

MR. MILLER: Good morning. I'm John Miller, Regional Director of FEMA, Region 7 in Kansas City. I'm here to welcome you this morning to the At-Large Stakeholders Meeting on behalf of Director Witt and Kay Gaus (phonetic), who is the Associate Director of Preparedness, Training, and Exercises. I don't want to leave anybody out here. On behalf of my colleagues in Region 6, Buddie Young, who was not able to be here, and Michelle Berquette (phonetic), in Chicago, who was not able to be here, I want to welcome you to St. Louis, to the Central Territory, to Region 7 actually, but if you go, -- which way is east? If you go east, how far? Ten miles, you'll be in Region 5. So, we welcome you to the Central Territory.

I was looking at the sign-in sheets and I noticed that we have folks here from Michigan. And I was reading down through and I saw the State of A-R-K-A-N-S-A-S. I went to school in Kansas, and in Kansas they call it Ar-Kansas. And in Arkansas they call it Arkansas. So, whether you're from Arkansas or Ar-Kansas, we've got some folks from that state, too.

I wanted to talk to you just a moment this morning. I told a story in Kansas City. This summer I was at a class reunion of my wife, -- and we won't talk about how many years ago that was, and I ran into a woman there, when I told her what I did, she was, -- she lived within the EPZ of one of our nuclear power plants. And out of the blue she basically said to me,

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1 "Whatever you're doing, please keep doing it, because those of us
2 that live next to those power plants rely on you to make sure
3 that if, in the outside chance something happens, we can be safe
4 and our families can be safe". So, as we look to the meeting
5 today, as we are part of this Stakeholders Meeting, as you make
6 your comments, as you listen to the presentations, I have talked
7 to

8 Matthew, -- tell me your last name, Matthew?

9 MR. ALGEO: Algeo.

10 MR. MILLER: Algeo, on the NPR a couple of days ago.
11 And one of the things that I stressed to him is that even though
12 we look at changing some of the rules; at looking at
13 streamlining, that the health and safety of the people that live
14 around the nuclear power plants are our biggest concern and we
15 do not want to lose sight of that goal.

16 So, again, on behalf of those of us in the Central
17 Territory, welcome. I would invite you as, -- before Anne comes
18 up, that I think there's going to be some, -- this is not church,
19 so that, you know, you come in and sit in the back of the room,
20 if you, -- I think there's gonna be some slides, is that not
21 right?

22 MS. MARTIN: Right.

23 MR. MILLER: You might want to move forward so that
24 you have a better view. Again, welcome, and I look forward to a
25 fruitful meeting. And, I'll turn it over to Anne Martin.

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1 MS. MARTIN: Thank you, Director Miller. I'm Anne
2 Martin, the Deputy Director of the Exercises Division at FEMA
3 Headquarters, and also Chair of the Strategic Review Steering
4 Committee that's undertaking the process that we're here today to
5 review. I see many familiar faces in the audience. Some of you
6 were at Kansas City in September, and this is the overview, just
7 as we presented in September, but, would like to begin again.

8 In December of 1979, when FEMA was given the
9 responsibility for off-site radiological emergency response
10 planning, the mission then, just as it is now, is the protection
11 of public health and assuring public safety around commercial
12 nuclear power plants. Well, fifteen years later, in
13 approximately February of 1994, between February and September of
14 '96, NEMA, the National Emergency Management Association, at
15 their meetings, the PT&E Committee passed several resolutions
16 regarding the REP Program. In addition, in 1994 to 1997, the
17 National REP Conference attendees submitted proposed changes to
18 FEMA regarding the REP Program. In May of 1995, the Nuclear
19 Energy Institute submitted a White Paper suggesting changes to
20 the REP Program. And then, actually, some changes were made in
21 February of 1995 in Kansas City, when the Standard Exercise
22 Report format was developed, fondly known as the SERF Report.
23 Well, all of these activities, the NEMA resolutions, the National
24 REP Conference resolutions, NEI White Paper, various comments
25 that came out of regional REP conferences that had been held

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1 around the committee, -- country, indicated that, yes, perhaps it
2 was time to take a comprehensive look at the REP Program in 1997;
3 about seventeen years after the program first began. So, in June
4 of 1996, Director Witt directed that the first Comprehensive REP
5 Program Review would be undertaken. Now, the national stage also
6 set the stage for this, because the current administration was
7 conducting the National Performance Review. That, of course, is
8 looking at the public service rendered by the Federal Government
9 to revalidate programs and procedures to be sure that they are
10 appropriate for the current time. As a result of the Government
11 Performance and Results Act, of course, the Federal Government
12 was directed to take an in-depth at performance criteria and also
13 the results coming out of active programs. There were two Acts
14 that, when we began the strategic review of the REP Program that
15 we had to take into consideration. One is the Federal Advisory
16 Committee Act. That's an Act that's administered by the General
17 Services Administration. And that, in essence, says that the
18 Federal Government, to participate with the public in any policy-
19 making, Federal committee must be established. That's been an
20 eighteen to twenty-four month process. So, that told us that we
21 would have to involve the public in a different way than perhaps
22 our Government partners. The other Act that formed the basis for
23 the strategic review is the Unfunded Mandates Reform Act. Many
24 of you may be familiar with that. That was signed by President
25 Clinton in March of 1995. And, in essence, it said that agencies

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1 should seek out actively state, local and tribal views prior to
2 implementing any programs, and that agencies should consult with
3 a wide variety of Government entities, taking place as early as
4 possible when a program is either developed or revised.

5 I mentioned the model that the committee has used is
6 the Government's Performance and Results Act model. That, in
7 essence, says that the first activity is a needs assessment.
8 Look at the program; look at the procedures; look at the current
9 need for the program; to assess the objectives. As I mentioned
10 early, the objective in 1997, remains the same as it did in 1979.

11 And that's protection of the public health and safety around
12 commercial plants. The GPRA model dictates that strategies be
13 developed for this particular review. And that we did. And,
14 also, to identify the stakeholders. The stakeholders that we
15 identified for the strategic review of the REP Program is, of
16 course, anyone who has a stake or an interest in the program. As
17 I mentioned, that certainly includes the local government, state
18 governments, tribal governments, the public citizen, the power
19 plants, and also other Federal departments and agencies.

20 Another model that we used that differed a bit from
21 planning in the past, -- or, I should say in the past, quite
22 often the Linear Planning Model is used. That is where a plan is
23 developed, -- John mentioned when we were chatting earlier about
24 the, -- inside the belt-way; often the plan is developed inside
25 the belt-way, then that results in a draft document which is then

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1 implemented. Well, to undertake the strategic review of the REP
2 Program we used the Accordion Planning Model. And if you'll look
3 closely at that overhead, the circles indicate the Strategic
4 Review Steering Committee, and the squares, at the top and the
5 bottom, indicate our stakeholders. So, you can see the Strategic
6 Review Steering Committee began work and then went out to the
7 state and local stakeholders. The Strategic Review Steering
8 Committee, again, took in those comments, then we went to the
9 Federal stakeholders. That was a meeting that was held in
10 November, and I'll tell you a little bit more about that shortly.

11 And now, we're at that third block which is the public
12 stakeholders. We're here for your comments to the Strategic
13 Review Steering Committee. And I might mention that all of the
14 committee members are here today. Only at that point will a
15 draft document be developed, and then that will go back out again
16 for public comment in the Federal Register. Then,
17 recommendations and any implementation would result from that.

18 So, let me take you on the actual, -- an assessment of
19 how the strategic review has been conducted. In July of 1996,
20 the strategic review was announced, and that was done in the
21 Federal Register. That Federal Register notice, I'm sure many,
22 or all of you perhaps saw it. That said,

23 *"Tell us, -- this is an opportunity. Any*
24 *comments you, perhaps, have wanted to make*
25 *at any point in time, this is an opportunity*

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1 to do that. Just please send us your
2 comments about the REP Program" .

3 This notice was open for a hundred and twenty days, and resulting
4 from that were sixty respondents with a hundred and seventy-eight
5 specific comments. You'll see on the next transparency the major
6 topic areas for those comments. As you can see, the majority of
7 them were on exercises. The committee took those comments, along
8 with the NEMA resolutions, the National REP Conference comments,
9 all of the comments that have come in from regional conferences,
10 and the NEI White Paper, studied those, deliberated, and from all
11 of those concepts, -- from all of those comments, four principal
12 concepts emerged. And those concepts you'll be hearing today.
13 They'll be presented very shortly. The concepts are: Delegated
14 State; Exercise Streamlining; Partnership in the REP Program; and
15 the Radiological aspects of REP. We'll go into a bit more
16 detail, as I mentioned, in the presentations.

17 Now, I'd like to tell you a little bit about the
18 Strategic Review Steering Committee, because, again, we
19 established the Steering Committee with an eye to bringing
20 everyone to the table who could represent the management and the
21 interest in the REP Program. In light of that, the Nuclear
22 Regulatory Commission is part of the Steering Committee, both the
23 Emergency Preparedness side of NRC, as well as the Response side.
24 We have included the Preparedness, Training, and Exercises
25 Regional Management, where the responsibility for the program

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1 lies. We've included the Regional Advisory Committee Chairs, and
2 also representatives from REP Policy and REP Training in FEMA
3 Headquarters. And, I'd also like to mention that the REP Chairs
4 for the territory are here. Woodie Curtis from Region 5, Larry
5 Earp from Region 6 and Bob Bissell from Region 7. So, if you
6 gentlemen would like to stand up for a moment, I'm sure you know
7 everyone. Thank you.

8 So, taking all of those comments in January of '97, the
9 Strategic Review Steering Committee began deliberations. Also in
10 January of '97, change was made to the program. And I know all
11 of you are familiar with the Regional Advisory Committee, or the
12 Regional Assistance Committee; we established what's known as the
13 RACAC Act. The Regional Assistance Committee Chairs Advisory
14 Committee. And this was an opportunity for the RACAC chairs to
15 deliberate together; to discuss mutual concerns; to look at
16 providing for consistency across all of the FEMA region across
17 the nation. The RACAC(s) had been in existence for, -- oh, over
18 twenty years. And, of course, when FEMA became responsible for
19 the program in 1979, FEMA took advantage of that infrastructure,
20 but, in essence, the RACAC(s) had been, -- until 1997, had not
21 had a forum for the Chairs to come together to discuss issues.

22 In July of '97, this committee reviewed the Concept
23 Papers that you'll be reviewing today. And in September, as I
24 mentioned earlier, we had the Government Stakeholders Meeting in
25 Kansas City. That was designated stakeholders from local

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1 governments, from the state governments, as well as tribal
2 governments. In November of '97, just last month, we had what we
3 called our "*Federal Forum*". And that was representatives of
4 other departments and agencies, or RACAC members who met in
5 Dallas to, again, review the same Concept Papers that you'll be
6 reviewing today. And this month, December, we are holding our
7 At-Large Public Stakeholders Meeting. The first one was held on
8 Tuesday in San Francisco. Of course, today we're here in the
9 midwest, in St. Louis, and tomorrow we'll be presenting the
10 Concept Papers in Washington, D.C., for the eastern territory.
11 These meetings were noticed in the Federal Register, with press
12 releases, and, of course, as I mentioned, are open to the public.
13 And in January of 1998, we anticipate having a meeting and
14 taking the Concept Papers to our own FEMA staff, who are
15 responsible for the program.

16 So, what's in the future? Where are we going with all
17 of the comments that we receive today and at the other public
18 meetings? The committee anticipates that in March all of the
19 comments will be assessed, will be looked at in the context of
20 the Concept Papers, and by March of '98, proposed recommendations
21 would be made to FEMA Director Witt. Of course, any
22 recommendations would be published in the Federal Register, as I
23 mentioned earlier, with a comment period. And then in June,
24 roughly six months from now, specific program recommendations
25 would be made to Director Witt. And, of course, after those

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1 program recommendations are approved by Director Witt, any that
2 are, or all that are, then the FEMA regions and headquarters
3 would implement any changes that would result from that.

4 That concludes my briefing. Here's the agenda for
5 today, indicating the Concept Paper presentation, and then the
6 public comment period. As time allows, we may take some
7 liberties with those times. What we will not change, of course,
8 is your opportunity for comments. So, there will be adequate
9 opportunity for that. I also would point out that we have a
10 recorder who will be documenting the entire proceeding, and the
11 transcript of today's meeting will be placed on the FEMA/REP home
12 page or the FEMA home page on the web site. A transcript of
13 today's meeting, the San Francisco meeting, and also the
14 Washington meeting.

15 So, now, it's my pleasure to introduce to you Mr. Rick
16 Auman. Rick is with Human Technologies, Incorporated, and we
17 have contracted with Human Technologies to facilitate these
18 meetings. So, Rick will now take us through the presentation of
19 the Concept Papers.

20 MR. AUMAN: Thanks, Anne. I'll be the Moderator
21 today. And I would like to just spend a few minutes talking
22 about some ground rules for today so that we have the opportunity
23 to both answer your questions about these Concept Papers, if you
24 have any, and, as well, get your comments about these at the same
25 time later on this morning. As you saw in your Agenda, each of

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1 these Concept Papers will be presented in overview. For those of
2 you who have been to other stakeholders meetings this will be
3 more of a review than an overview, but for those of you who have
4 not seen the Concept Papers before you'll get an overview of each
5 of those Concept Papers. We would ask you during that time to
6 ask, -- to hold your questions until the end of the
7 presentations. There will be time for questions at the end of
8 each presentation. So, if you'd just jot those down and wait
9 until the end of the presentation we'll take them at that time.
10 If you do have clarifying questions, questions about the Concept
11 Papers, we would ask you to come to the microphone in the center
12 here (indicating). With the smaller numbers we decided to just
13 go with one microphone this morning. So, if you'd just come to
14 the microphone in the front I'll just give you the nod when we're
15 ready to start taking questions and you can come up and answer
16 (sic) those. Later on today, our schedule
17 is currently set to begin prepared comments at 1:30. However, if
18 we get through these Concept Papers and there are not questions,
19 we will begin prepared comments this morning as time permits.
20 But we will stay until we have gotten through all of those
21 comments that you have. We've asked that each of you limit your
22 comments to five minutes. We did that specifically because we
23 want to make sure everyone has the opportunity to provide
24 comments. However, with the numbers being what they are today
25 and the time we have available, if you would like to take another

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1 shot, come back up and have something else to offer, we would
2 certainly welcome that. We'd just ask you to go to the back of
3 the line and then come through again. Because we only have one
4 microphone, we'll simply cue up in the center here, and I'll
5 indicate to each of you as you come through. There will be
6 somebody there to brief you on
7 the, -- before you begin your comments, we're gonna ask you to
8 give us your name and your affiliation. And before you begin
9 your comments, -- that will help our, -- a stenographer over here
10 who's taking notes, as well as let everybody else know the
11 context of your perspective that you're offering here.

12 We will take the last comments at 3:55, if it lasts
13 that long, and we'll end at four o'clock. Again, we will accept
14 all written comments, but given the amount of time we have today
15 I don't think we'll go that long. But, we'll certainly, -- if
16 you have those things to say, we'll stay that long and listen to
17 them. Are there any questions about the ground rules for today?

18 (No Verbal Response)

19 MR. AUMAN: If not, we'll start with our first
20 presentation on the Partnership Paper. That will be presented by
21 Sharon Stoffel and Mary Lynne Miller.

22 **PARTNERSHIP CONCEPT PAPER**

23 MS. MILLER: Good morning. My name is Mary Lynne
24 Miller, I'm with FEMA Region 4 from the Atlanta Regional Office.
25 With me today is Stanley McIntosh, who's my very able slide

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1 flipper. Stanley is from FEMA Region 2 in New York, and Sharon
2 Stoffel is with FEMA Region 1 in Boston. So, you've got kind of
3 a wide variety of geographic locations for you. So, John Miller,
4 -- there's representation I would say from probably all over the
5 country here.

6 As Anne indicated, basically the role of the committee
7 was to take in comments, and, of course, this is true of all the
8 papers, but just to highlight, -- to look at the comments that
9 we've received, take in the feedback from the stakeholders and
10 assimilate these into overall broad Concept Papers. And what
11 seemed to emerge fairly quickly for us as we look through these
12 papers, was a theme of increased partnership and increased open
13 communication. So, basically, that seemed to emerge as the
14 partnership concept. And we're presenting that to you first
15 today, because it is more or less of an over-arching subject.
16 So, it will probably kind of set the stage for the other Concept
17 Papers in general. And, of course, the basic
18 issue is, should the role traditionally assumed by FEMA be
19 modified from that principally formerly of an evaluator of state
20 and local ability to implement emergency response plans, to one
21 more defined as a partnership, with a broader relationship, and,
22 again, to include more open communication. And as we looked at
23 the topic it seemed to pretty much emerge into four primary topic
24 areas. And I will present the first two sections of that, and
25 then turn it over to Sharon, who will give you the second two.

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1 The first two sections are, -- the first is Performance, which
2 centers on basic aspects of actually accomplishing the program.
3 The second is Policy, and the different modes of developing
4 actual policy. Sharon will then pick up with Technical
5 Assistance, and ways that can be increased, and Federal exercise
6 participation. And, with these four topic areas I think I really
7 should point out that they are really rather independent. In
8 other words, any of these various areas could be implemented
9 without the others, and really would not affect the integrity of
10 any particular one. But, of course, the more of these that would
11 be adopted, of course, the partnership itself would be
12 substantially enhanced.

13 Beginning first then with the Performance Section.
14 Many commenters proposed that federal, state, local and tribal
15 government entities all have the same goal of protecting health
16 and safety of the public. And, so, many comments received
17 focused on providing more flexibility to state and local
18 governments, and reducing federal oversight in general. And,
19 many commenters relay that the environment that we exist in now
20 is particularly applicable to this type of environment in REP, in
21 the way it has evolved over the years since the program was
22 created. First, over the years that the program has existed, a
23 very excellent definition of the capability that must exist
24 within a state and local government to protect the public has
25 been refined fairly intensively. And at the same time, the

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1 experience level of those entities has increased over those
2 years. So, the commenters maintain that that combination of
3 definition and experience really take us to a point where a
4 higher degree of control over the program by those entities is
5 appropriate.

6 It's kind of a busy slide, let me kind of walk you
7 through this. The model that's being used, and I think, -- I
8 know this is probably not new to too many people. Anne mentioned
9 in her presentation about the Government Performance Results Act
10 essentially being used as a model by the Federal Government in
11 strategic planning. In the context of REP, this program, -- GPRA
12 would really involve a tier structure of strategic goal setting.

13 And, of course, starting at the top with Goals, which support
14 the mission, it's envisioned that this would, -- or could be more
15 or less of a national process of setting goals for the program.
16 Then moving into Results Focused Objectives, and normally, a
17 course at that level of strategic planning performance measures
18 are added to really gauge where you are in the process. Which
19 the envision of that is that it would be a national process, with
20 stakeholders involved, so there's a common direction for the
21 program moving. And then, at the next level, in more of a
22 state/local unique aspect, after those national goals have been
23 established, to move into unique outcomes. In other words, not
24 prescriptive in how you would get there, but just where you're
25 going; just pretty much the model for GPRA. And those would be

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1 unique to state and local governments. And, I guess the basic
2 question that has emerged, -- we had that suggested in a number
3 of papers, I guess the question that would emerge from that is, -
4 - and this is the feedback we would like to hear from you, is REP
5 already there? In other words, is the program already well
6 focused enough that the objectives and goals are already well set
7 enough that it's not really necessary to go back and go into a
8 strategic review beyond a course, -- the process that we're
9 overtaking here.

10 Now, at the bottom of the slide you'll see on the left-
11 hand side the initials "PPA". That is a Performance Partnership
12 Agreements. And, basically, the National Performance Review Act
13 recommended that Performance Partnership Agreements, or PPA(s),
14 be established between various levels of government. And, this
15 is one way that the Strategic Review process can take place. And
16 a number of commenters recommended that REP be included in the
17 Performance Partnership Agreements that FEMA has with each state
18 in a non-disaster context. Of course, the funding that comes
19 from the utilities to state and local government does not come
20 through FEMA, and this paper does not recommend a change in that
21 process to insert it through the PPA. The PPA is really not a
22 funding document, but a strategic goal setting document. And,
23 actually, the paper points out that the use of the PPA in the
24 sense that as long as the strategic goal setting process takes
25 place, the PPA aspect is somewhat optional. But, we'd like to

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1 know what you think in terms of that placement of REP in the PPA.

2 Next slide please, Stanley.

3 There's a little bit of a disconnect in terms of the
4 lettering between the paper and the slides. So, if you're
5 familiar with it let me just, -- so you're not confused. There
6 is a Section B in the paper itself, it was an evaluation section.
7 And we found as we moved through the paper that it duplicated
8 the Exercise Streamlining Paper, which you'll hear later on this
9 morning. So, we've actually moved that section into that paper.

10 So, there's a little bit of a disconnect. Actually, Policy
11 Development is Item C in the paper that you have in front of you,
12 moving into that second area. Excuse me. I'm trying to come
13 down with a cold; I've been traveling too much.

14 In the Policy area, the recommendation was to, of
15 course, broaden stakeholder involvement in the development of
16 ongoing policy. And various input measures were recommended in
17 the input, including use of workshops and conferences, among
18 others. And, Anne mentioned the Kansas City conference, where
19 the Standard Evaluation Report Format, or SERF was developed.
20 And that was brought up as a positive process model by a number
21 of the commenters. And, the comments, frankly, that we've
22 received to date, from our stakeholders as we've moved through
23 this process have been very positive in terms of the feedback and
24 feed-in. I know some of you were in Kansas City, and, overall,
25 we've had a fairly good approval rating on that increased

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1 stakeholder process. And, of course, the pros of continuing,
2 and, in fact, increasing stakeholder involvement in policy
3 development include increased ownership, improved consistency,
4 and broader access to technical expertise. Which, of course,
5 exists at the state and local level. It does have to be
6 recognized, however, in going through that type of process, as
7 we've discovered as this committee, that it does take time to get
8 that stakeholder input. And, so, in order to get into that in-
9 depth analysis, you know, one must accept that you're going
10 through a more lengthy process. Certainly what you get at the
11 end is certainly more worth it. That's all for policy. I'll now
12 turn it over to Sharon, who will pick up for the balance of the
13 paper. Thank you.

14 MS. STOFFEL: Good morning. I'm going to be talking
15 with you about technical assistance ideas that were conveyed to
16 us. Let me first explain that we're using the term "*Technical*
17 *assistance*," but not in a purely technical way. The context is
18 much broader than purely radiological technical assistance. It
19 would also extend to planning and programmatic kinds of
20 assistance.

21 As Mary Lynne has suggested, there were a great deal of
22 comments suggesting that FEMA shift its emphasis away from
23 prescriptive evaluation to one, -- a role of more technical
24 assistance provider, to states, tribal nations and local
25 government. And, by doing this, we would improve the partnership

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1 relationship of FEMA with these various entities; we would move
2 from our role of evaluator, to one of facilitator/educator. And,
3 with the ultimate desired goal of improved customer service.
4 Some of the suggestions in the paper that had to do with
5 technical assistance included plan improvement. Which would mean
6 that we would, -- we at FEMA would provide more assistance with
7 emergency preparedness plans. A second consideration has to do
8 with training assistance. And, again, the recommendations, or
9 the suggestions in the paper had to do with FEMA's increased
10 participation in training efforts on the part of states, tribal
11 nations and local governments. Courtesy evaluations are
12 happening in parts of the country, and the idea would be to
13 continue and to expand performing these courtesy evaluations,
14 which are less threatening, and when they're conducted during
15 rehearsals, give the exercise players an opportunity to correct
16 action midstream.

17 Radiological monitoring. It was proposed that FEMA
18 work with the other Federal agencies to identify radiological
19 monitoring and assessment capabilities to determine where more
20 effort is needed and to work with the affected entities to
21 accomplish meeting those needs.

22 It is suggested in the paper that we make use of the
23 internet. And one means of doing that is to create a web site
24 for technical assistance.

25 Emphasis on corrective actions versus grading. The

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1 idea would be to correct issues during drills or exercises, and
2 with less emphasis on the ultimate grade, the real emphasis being
3 on the learning experience. And that is felt to improve
4 relationships, as has been noted before. It was suggested that
5 FEMA take a more active role in the emergency alert system.
6 Special needs: Data assistance. FEMA could provide a role of
7 assistance in dealing with the Privacy Act issues surrounding
8 that area of activity. There were other areas mentioned,
9 principally, technical assistance conferences and more site
10 visits. Essentially, the effort being one of getting out into
11 the field and working with our entities more on a face-to-face
12 basis.

13 The last part of the paper has to do with Federal
14 Exercise Participation. If there were to be more extensive
15 federal participation in exercises that would give our partners
16 improved knowledge of federal plans and the resources that would
17 be expected if there were to be a real incident. It would afford
18 us the opportunity to exercise the relationship between the
19 Federal Radiological Emergency Response Plan and the Federal
20 Response Plan. A major consideration in having more federal
21 participation is resources and there would need to be a far
22 greater commitment of resources on the part of the federal
23 agencies involved, in order to commit to a desired greater level
24 of federal participation.

25 Those are the four major areas of our, -- of the

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1 Partnership Paper. I'd like to thank you for your attention.

2 MR. AUMAN: We have time for questions now, if you
3 have any.

4 (Mr. Brown, Standing For Question)

5 MR. AUMAN: Yeah, please.

6 MR. BROWN: My name is, -- is this on?

7 MR. AUMAN: Flip the switch there, it may, -- right on
8 the side. There you go.

9 MR. BROWN: There we go. My name is Charles Brown,
10 with the Southern Nuclear Operating Company, Plant Atch
11 (phonetic), in Birmingham, Alabama. A question I want to bring
12 up is on the Item 9, FEMA liaisons spending more time in the
13 field. And, you're talking down here at the bottom that funding
14 would be a consideration. Are you talking about increased
15 funding or a decrease in funding?

16 MS. MILLER: I believe the presumption, -- I don't
17 think this is on.

18 (Pause)

19 MS. MILLER: I think the underlying presumption in the
20 effort that we've all undertaken in the streamlining effort is
21 not to look to increasing funding. I think
22 it's, -- our orientation will be to, -- more efficient use of
23 funding and a possibility of a lessor level of activity in terms
24 of resource commitment. But, essentially, I think reallocation
25 of resources would be the primary consideration in terms of use

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1 of current manpower.

2 MR. AUMAN: Any other questions?

3 (No Verbal Response)

4 MR. AUMAN: If not, I'll thank Sharon and Mary Lynne
5 and Stanley. And, our second paper on Radiological Focus will be
6 presented by Falk Kantor, Tom Essig, Bill McNutt and Marcus
7 Wyche.

8 **RADIOLOGICAL FOCUS CONCEPT PAPER**

9 MR. KANTOR: Good morning. I'm Falk Kantor. I'm with
10 the Nuclear Regulatory Commission. I'm a member of the Strategic
11 Review Steering Committee. And I'll be assisted in my
12 presentation here this morning by Tom Essig of the NRC, Bill
13 McNutt of FEMA, and Marcus Wyche, also of FEMA.

14 If you look at the REP Program and how it developed and
15 how we got to where we are today, you'll see there was some
16 guidance that was issued in the early '70(s), if you're familiar
17 with the publication called "NuReg-75/111," referred to in some
18 places as the "*Checklist*". That document recommended that the
19 plan format be a general State Emergency Plan, a stand-alone, a
20 Radiological Emergency Response Plan or RERP, and then standard
21 operating procedures. Well, as the world of emergency management
22 has matured, we have moved more toward a direction of all-hazards
23 planning. In fact, if you examine FEMA's Mission Statement
24 today, one of the goals of FEMA is to establish, in concert with
25 FEMA's partners, a national emergency management system that is

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1 comprehensive, risk-based, and all-hazards in approach. So, we
2 received quite a few comments related to moving the REP Program
3 more into the all-hazards approach to emergency management. And
4 a related issue developed, as we looked at the all-hazards
5 approach, and the issue became, *"Would the REP Program be more
6 effective and streamlining by focusing more on radiological
7 activities and less on non-radiological activities?"* So, that is
8 the issue in this Concept Paper.

9 As background, our committee reviewed the emergency
10 planning standards, the evaluation criteria, NuReg-0654. We
11 looked at the exercise objectives in FEMA REP-14, the
12 demonstration criteria, and also the points of review in FEMA
13 REP-15. We examined the regulatory basis for REP as presented in
14 NRC and FEMA regulations to see if there was any impediment to
15 moving in this direction. And, we also took a very preliminary
16 look at the extent of changes that might be required in program
17 guidance documents if we moved in the direction of focusing more
18 on rad and less on the generic aspects of emergency response.
19 But, keeping in mind all the while, that under the current
20 program all emergency planning standards must be met, and the
21 resulting REP Program as been mentioned earlier, must continue to
22 provide reasonable assurance that the public health and safety
23 can be protected. However, how this would be accomplished may
24 differ from what is already in place. And that's the direction
25 our strategic review is moving in.

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1 In looking at the all-hazards approach FEMA has issued
2 a guide, State and Local Guide 101, Guidance For All-Hazards
3 Emergency Planning was issued September '96. And it recommended
4 a basic emergency operations plan which would be composed of a
5 basic plan, functional annexes made up of the core functions of
6 EOP, such as direction, control, communications and so forth, and
7 then hazards-specific appendices which could, of course, be a
8 nuclear power plant accident. And, several states have modified
9 their plans to resemble the all-hazards approach. Some states
10 are more advanced than others. In Kansas City we got feedback
11 from quite a few of the states and local organizations present as
12 to how they have attempted to accommodate REP in their all-hazard
13 planning. But, it became apparent to us at least, that the
14 format of the plan was not really the issue. If you just
15 reformatted your plan to fit an all-hazards format from a
16 strategic review point, not much has really been gained. And
17 then, regardless of the format, the personnel that they're going
18 to implement need to be familiar with the plans and procedures
19 and be able to demonstrate that they can respond to an accident.

20 So, as I mentioned, we reviewed the NuReg-0654 planning
21 standards and evaluation criteria, and it quickly became apparent
22 that these do not readily lend themselves to dividing into a
23 radiological versus non-radiological standards or evaluation
24 criteria. It looked more useful to us to look closer at the
25 exercise objectives in REP-14, the demonstration criteria in

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1 (14), and the points of review found in the FEMA REP-15. In
2 looking at these exercise objectives and trying to identify the
3 purely non-radiological ones, we identified a few, four you see
4 listed there. And even these can be argumentative as to whether
5 they are purely non-radiological in function. But, there are a
6 couple that, you know, clearly were, -- could be considered non-
7 radiological. Now, if you look at the objectives that have
8 components of both radiological and non-radiological aspects to
9 them, there are quite a few more as you can see, listed there.
10 Objectives such as, -- oh, direction and control, communications
11 alert and notification, all have aspects of radiological versus
12 generic response activities. And then, exploring further, if you
13 look at the objectives that are clearly radiological in function,
14 you see there's another group that can be readily identified as
15 being primarily radiological functions.

16 So, that was our look at that. And none of these are
17 set in concrete, by the way, that was just our view of the
18 objectives and how they might lend themselves to radiological
19 versus non-radiological.

20 And state and local governments have been demonstrating
21 the ability to meet these objectives in exercises over the years,
22 and they're quite comfortable in that approach. And, the
23 question developed, *"Is it practicable to separate the objectives*
24 *demonstration criteria and points of review that are considered*
25 *radiological, from the ones that are non-radiological? And if*

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1 so, which ones?" That was one of the questions we have on the
2 committee. For example, if you look at the objective of
3 communications, it appears to be generic in function. Every
4 exercise, all-hazards exercise or any response to actual events
5 involve communications of some certain extent. However, some of
6 the demonstration criteria, some of the aspects of communications
7 are definitely radiological, such as communications between
8 various emergency response facilities, communications between
9 response facilities and field teams, and other communications
10 involving the radiological matters. Now, the question is, "*Can*
11 *the functions be separated without affecting the execution of the*
12 *exercise?*" Another objective we looked at for an example, is
13 staffing. There is a guidance that staffing, -- full staffing
14 should be demonstrated once every six years, but, twenty-four
15 hour staffing appears to be generic, and could be demonstrated in
16 other means. However, there is an aspect to it that involves
17 radiological activities, and that's when one shift replaces
18 another, a briefing should take place, informing the oncoming
19 shift of the status of the plant, radiological conditions,
20 effective actions and that sort of thing. So, there's a
21 radiological aspect to that function also. Then, if you look at
22 the concept of the integrated exercise itself, the regulations
23 have some requirements or discussion of the, -- an exercise. An
24 exercise should test the integrated capabilities of all the
25 participating organizations, the licensee, state and local

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1 response organizations. The regulations speak about testing the
2 major observable portions of the on-site and off-site response
3 agencies and mobilization of resources. And the regulations, of
4 course, also speak about requiring a exercise on a bi-annual,
5 once every two year, basis.

6 So, in order to conduct a truly integrated exercise as
7 our regulations require, it's necessary to include some of these
8 non-radiological aspects in the exercise, the so-called "glue,"
9 communications, direction and control, mobilization, staffing.
10 Those sort of things all are required to have, -- to be performed
11 when you do a full exercise. So, in that sense, it is difficult
12 to separate out the radiological from the non-radiological.

13 So, as a working group here in the committee, we
14 developed a possible alternative approach to the fully integrated
15 exercise, and Tom Essig is going to discuss that with you.

16 MR. ESSIG: First, we'll walk you through a flow chart
17 here that we have. The alternative approaches, as you can see
18 here on the left, we have Discrete Drills, Readiness Appraisals,
19 Exercise Credit for Real Emergencies, Expanded Use of the Annual
20 Letter of Certification. Those would feed into a full
21 participation exercise which may be of lesser frequency, and
22 that, in turn, would feed into an overall adequacy finding.

23 Next, I will walk you through, -- and the next four
24 slides will discuss these possible alternative approaches in some
25 additional detail. Discrete drills are certainly something that

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1 is not a new concept, and we're not trying to advertise it as
2 such. We already have a number of instances where drills are
3 done apart from the full scale exercise. And examples of these
4 are the field monitoring teams could be demonstrating expertise
5 in using survey meters and taking samples, quite separately and
6 apart from the full-scale exercise; emergency workers
7 demonstrating capability and knowledge of dosimetry; direction
8 and control people with direction and control responsibility
9 showing they understand the technical information coming from the
10 utility rad health officials and so forth. And then other
11 aspects of discrete drills, emergency medical staff, this is
12 quite often done as a discrete drill as many of you know,
13 currently. And health physics drills also could be done as a
14 discrete, separate drill.

15 The other concept that was shown on the flow chart were
16 Readiness Appraisals. Now, this, -- the term "*Readiness*
17 *Appraisal*" is something that is, -- would be somewhat new to the
18 program, although its elements are taken from, -- many of them
19 are ongoing activities, such as walk-throughs, for example, which
20 might be synonymous with a table top inspections, or something
21 that would be relatively new. But, certainly a review of
22 inventory, -- or a roster review and an inventory would not be
23 necessarily new. Audits of resources and verifying current
24 information listed in the Letters of Agreement would be another
25 way of accomplishing or determining whether or not a state or

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1 local government was ready.

2 The other possible alternative approaches, as Falk was
3 mentioning, the non-radiological objectives could be demonstrated
4 in an all-hazards exercise, and then the results from that could
5 be coordinated with the REP evaluations. Expanding the exercise
6 credit for real emergencies is something that is currently done.

7 And this concept would simply continue that, and perhaps even
8 expand on it. And, lastly there, the State Assessment of Plan
9 Preparedness, we could use an expanded Annual Letter of
10 Certification as another possible alternative approach.

11 Now, we realize that focusing on the radiological
12 aspects of REP may require current changes in the REP Program; a
13 change in the conduct and frequency of exercises as an example.

14 So, we'd like to leave you with some issues to ponder
15 which we're thinking about, and we'd ask you to think about as
16 well. First, can FEMA make its adequacy findings based on drills
17 and exercises, other preparedness activities combined with less
18 frequent, full-scale exercise participation? And if so, how?
19 Can we focus on the radiological aspects without affecting the
20 exercise process. That is, or would we lose something there?
21 How, and with what frequency can we make judgments on reasonable
22 assurance under this, -- under a revised format? Would more
23 focus on the radiological function fragment the exercise process?
24 Does the emphasis on radiological aspects, and less emphasis on
25 generic, merit further consideration? And, with that, I'd like

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1 to turn it over to Bill McNutt, if you have some additional
2 comments.

3 MR. MCNUTT: Good morning. I'm Bill McNutt. I'm with
4 the State and Local Preparedness Division at FEMA Headquarters.
5 And I just want to emphasis that, --

6 MR. AUMAN: I'm not sure your microphone's working,
7 Bill.

8 MR. MCNUTT: It's not working?

9 MR. AUMAN: Try again. See if that's turned on. Talk
10 a little closer to it.

11 MR. MCNUTT: All right. Can you hear me?

12 MR. ESSIG: Just speak louder, Bill.

13 MR. MCNUTT: All right.

14 MR. ESSIG: This one (indicating), isn't working. If
15 they can hear you speak, --

16 MR. MCNUTT: Okay.

17 MR. ESSIG: -- okay. Go ahead and speak.

18 MR. MCNUTT: I just want to emphasize that the essence
19 of this concept is the alternative approach. An alternative
20 approach by which FEMA would make findings on the adequacy of
21 off-site plan and preparedness. As you've just heard, the
22 elements of this approach include discrete radiological drills,
23 which would involve an evaluator or maybe two evaluators at these
24 various discrete drills. Much less than what is now required, a
25 more evaluator-intensive exercise. For these drills you plug in

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1 the readiness assessments, and FEMA has a document called "*The*
2 *Capability Assessment for Readiness*," which will assist a state
3 in doing these type of things, and documenting them. We add to
4 that, your participation in, -- state participation and locals,
5 in other types of exercises other than REP, as well as expanding
6 the credit for responding to real emergencies, and then expanding
7 the Letter of Certification, whereby a state certify that they
8 have done certain periodic requirements from the, -- from our
9 guidance in NuReg-0654. You tie these all together, and what
10 have you got? Well, you might not have much unless you then step
11 back and look at the frequency of the exercise. And to that
12 proposal would include a view of that frequency to perhaps, maybe
13 relaxing it to once every three years or once every four years.

14 So, that's the essence of this alternative approach.
15 And we'd be glad to hear any comments you have.

16 MR. AUMAN: Thanks, Bill. Questions?

17 (No Verbal Response)

18 MR. AUMAN: No? If not, thank you, Bill, Marcus, Tom
19 and Falk. The next presentation will be on Exercise
20 Streamlining. That will be presented by Janet Lamb, Woodie
21 Curtis and Bob Bissell.

22 EXERCISE STREAMLINING CONCEPT PAPERS

23 MS. LAMB: Thank you, Rick. Good morning, everyone.
24 My name is Janet Lamb, I'm the Regional Assistance Committee
25 Chairperson from FEMA Region 3 in Philadelphia. And with me is

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1 Woodie Curtis, the Regional Assistance Committee Chairperson from
2 Region 5 in Chicago, and Bob Bissell, the Regional Assistance
3 Committee Chairperson from Region 7 in Kansas City.

4 When we initially began our review of your comments, it
5 became evident very quickly that many of those comments, -- and I
6 think there were eighty-nine separate comments that specifically
7 related to exercises and the exercise evaluation process. We
8 took all of those comments and separated them into like groups,
9 and we quickly also discovered that there may be several
10 different ways and methods that we could use to come to the
11 conclusion that reasonable assurance does exist, that the health
12 and safety of the citizens around our nuclear power stations can
13 be protected.

14 We have come up with eight areas that we will discuss
15 in a few minutes, that could be used beyond just the exercise
16 evaluation process, to come to those reasonable assurance
17 conclusions. We would like to say that we would consider each of
18 these, not individually, but as part of the group, to provide
19 that reasonable assurance. While we were developing the Exercise
20 Streamlining Paper we also looked to developing an evaluation
21 tool that was much more results oriented than the current
22 evaluation tool. And a sample of what we came up with has been
23 attached to the Exercise Streamlining Paper. We would like you
24 to be aware that this is only one approach of how the evaluation
25 tool could be modified to be more results based, than objective

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1 driven. And, Bob Bissell will now discover, -- discuss each of
2 the eight topics that are contained in our paper.

3 MR. BISSELL: Thanks, Jan. Morning. As Jan said, we
4 consolidated the comments down to eight separate approaches to
5 streamline the exercise evaluation process. Some of the items
6 I'll go over this morning you've heard in more detail this
7 morning in the previous papers. What we've tried to do is tie
8 all these items back to the exercise evaluation process.

9 The first approach is the results oriented exercise
10 evaluation process. Currently, the evaluation process consists
11 of thirty-three objectives which were introduced in September of
12 1991. They do contain a sizeable number of points of review
13 which much be successfully demonstrated to meet the requirements
14 of each objective. As most of you know, this is a very
15 structured process and leaves very little latitude for the
16 evaluator. The proposed process is what we've termed the
17 "*Results Oriented Exercise Evaluation Process*". It does have a
18 reduced number of objectives. The checklist format is gone, and
19 the objectives are much more broad in nature. This proposal
20 allows the players to complete an activity without following a
21 specific checklist. For example, if a emergency management
22 decision was made to perform a certain emergency response
23 function, and that decision did not necessarily follow the plan
24 as far as procedures, responsibilities or resources, but the
25 appropriate decision was made and completed, that would not be an

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1 exercise issue. This certainly gives the players much more
2 latitude to reach a desired outcome. Evaluators would
3 concentrate on the outcome of the exercise participation and not
4 the means to complete a task.

5 The second option which was discussed in quite a bit of
6 detail earlier, was to have an increased focus on the
7 radiological aspects of REP. Evaluators would concentrate more
8 on the radiological objectives and less on the non-radiological
9 objectives. Those non-radiological objectives could be
10 demonstrated and/or observed by other means, such as credit for
11 real events, other non-REP exercises and staff assistance visits.

12 Some of the points of review and objectives do focus on response
13 procedures and capabilities which apply to any type of emergency,
14 such as fires, flooding, tornado and other natural and
15 technological hazards. In addition, some of these objectives are
16 routinely conducted by emergency responders during the various
17 non-REP exercises, such as hazard material exercises, and
18 chemical stockpile emergency preparedness exercises, and other
19 natural disaster exercises. Credit could be granted for these
20 actual responses and the exercise activity. The FEMA staff could
21 perform staff assistant visits on a regular basis to verify or
22 observe these efforts. Next slide.

23 The third approach is the Consolidation of Like
24 Objectives. We all know, I think, by now, that similarities
25 between objectives and repeated experience in the exercise

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1 evaluations provide evidence that several objectives can be
2 combined without affecting the evaluation process. This
3 certainly would eliminate redundancy in the points of review and
4 shorten the exercise process, possibly reduce the number of
5 evaluators required at the exercise, and the cost of the
6 exercise. Some of those potential objectives that could be
7 combined are listed on the screen. There are certainly more, but
8 those are just a few to give you an idea of where we were heading
9 with this concept.

10 The forth approach is to update REP policy and
11 guidance. And, basically the commenters felt that FEMA has not
12 done a very good job in updating the REP policy and guidance
13 materials to reflect changes in the program. Some examples would
14 be the change to the emergency alert system, and the issuance of
15 the new EPA 400 Manual, Protective Action Guides. Another
16 concern was with the manual itself. The commenters felt that it
17 should be designed to be user-friendly and easily updated with
18 page inserts.

19 In summary, I think our goal would be to create a
20 system which would quickly adopt changes in the program and
21 design an exercise manual which can be easily updated. Next
22 slide.

23 The fifth approach would be to change the frequency of
24 objective demonstration. One of the options discussed would be
25 to start the exercise at the post-emergency phase, and eliminate

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1 the emergency phase. The state and locals would like to have
2 that option. I think they all feel that we've probably beat to
3 death the emergency phase of the exercise process, and they would
4 like to spend that time normally spent on that phase in
5 performing other objectives. Less Frequent Demonstration
6 of Some Objectives. Certainly the most prominent theme there was
7 medical drills. Medical drills, most evaluators felt that
8 medical drills should be evaluated every two years, instead of on
9 an annual basis. More Frequent Demonstration of Some Objectives.

10 There was a lot of concern or interest, I guess, would be a
11 better word, in conducting more recovery and ingestion
12 objectives. And, again, this ties back to the first suggestion
13 on exercise phases; the state and locals would like to have at
14 least the option to conduct those ingestion and recovery
15 objectives if they felt they needed to strengthen those areas.

16 The last item that was suggested to us, -- and most
17 felt very strongly about this, was the Federal agency should play
18 more frequently during the ingestion exercises. Most felt the
19 need to know more about the Federal agency's roles and
20 responsibilities as it relates to their Federal Radiological
21 Emergency Plan. Next slide.

22 The sixth approach was Out of Sequence Demonstration.
23 Currently, we do perform a lot of out of sequence demonstrations,
24 but there seemed to be an interest to expand those objectives and
25 those facilities, that we do allow that to occur. Other

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1 activities that might qualify for this would be nursing homes,
2 correctional centers, radiological laboratories, ingestion field
3 teams, traffic and access control objectives, dose calculations,
4 monitoring and decontamination facilities, just to mention a few.

5
6 Another suggestion was to also do the plume and
7 ingestion out of sequence. A lot of commenters felt that trying
8 to cram those many objectives in two days was
9 quite, -- too much, and it didn't allow them to actually
10 concentrate on the objectives and performing those functions.
11 They would like to see the ingestion portion possibly done during
12 the off years. Do the plume phase the first year and the
13 ingestion phase the second year.

14 Another area of concern was the feedback that FEMA
15 provides during the post-critiques. There were a lot of concern,
16 -- there was a lot of concern that FEMA doesn't do a very good
17 job in this area. They would like to see immediate feedback
18 provided to the players immediately following the determination
19 of the drill or the exercise, while the players are all there and
20 their, -- the exercise is fresh on their minds. They would
21 certainly like to see more emphasis put on the positive things
22 accomplished, and, -- along with the concerns.

23 Another issue that was recommended to us was the Issue
24 Correction. The suggestion was made that the issues could be
25 corrected as soon as they're identified. For example, if the

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1 evaluator had a concern with the monitoring procedures, for
2 example, at an emergency worker monitoring decontamination
3 station; it's possible that the evaluator, in conjunction with
4 the state, could provide some on the spot training and
5 redemonstrate an objective while it's fresh on that player's
6 mind. The issue could be documented as an exercise issue in a
7 Standard Exercise Report, with a statement indicating that it has
8 been corrected and no further action is necessary. This would be
9 a positive and more meaningful experience, and it would result, -
10 - a positive and more meaningful experience would result when
11 this questionable performance was identified and immediately
12 corrected, instead of delaying demonstration until a later date.
13 As some of you know, sometimes that's not done for up to two
14 years.

15 A seventh approach is to expand the exercise credit.
16 Currently, there are only two objectives that actually qualify
17 for exercise credit, that's off-hours and unannounced drills. I
18 believe there has been some flexibility in the regions to expand
19 some of those objectives, but the commenters felt that they would
20 like to expand that greatly to include objectives such as
21 mobilization, facilities and equipment, communications, media
22 information, rumor controls, schools, traffic and access control,
23 just to mention a few.

24 One of the other concerns that were raised was that
25 FEMA should develop a standard implementation guideline that

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1 clearly identified the objectives that would qualify for exercise
2 credit, and they require documentation that they need to submit.
3 Next slide.

4 The last approach is sort of consolidation of some of
5 the previous topics we've discussed. There was a
6 concern, -- overall concern, that we should develop an
7 alternative evaluation approach in lieu of the formal exercise
8 evaluation process that we currently have now. One of the items
9 suggested was to, -- and you've heard a lot about this already
10 this morning, was for FEMA to conduct staff assistance visits.
11 And they could conduct personal interviews with players during
12 these staff assistance visits, during training sessions and out
13 of sequence drills and exercises, to verify credit for these
14 objectives demonstrated during other activities.

15 Out of Sequence Evaluations, we talked about that
16 earlier. Again, they would like to see those objectives that
17 qualify for that to be expanded. Possibly, include doing some of
18 those out of sequence evaluations; instead of within the one week
19 window that we typically do out of sequence evaluations, perform
20 some of those objectives and facility demonstrations during the
21 off years.

22 Credit for Actual Events, we've discussed that. Let's
23 expand those objectives that can qualify for credit.

24 Annual Letters of Certification should be expanded to
25 include items such as monitoring equipment maintenance and

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1 calibration dates, personal dosimetry operability and maintenance
2 records, potassium iodide requirements and shelf life,
3 communication drill results and self-assessment reports. These
4 elements, -- these objectives, could be
5 done through the Annual Letter of Certification, could be
6 addressed in lieu of the formal exercise evaluation process. And
7 verification of some of these objectives could be submitted in
8 the Annual Letter of Certification, and/or accomplished by staff
9 assistance visits.

10 The last item is Self-Assessment. There are some sites
11 where jurisdictions below the county level do participate. The
12 proposal there is that, -- let's allow those organization below
13 the county level to perform self- assessments and self-
14 evaluations. Those demonstrations, and the results of those
15 demonstrations, could be documented in the Annual Letter of
16 Certification as mentioned earlier. That concludes our
17 demonstration, -- or comments.

18 MR. AUMAN: Thanks, Bob. Questions, please?

19 (Ms. Drey, Standing For Question)

20 MR. AUMAN: Yes.

21 MS. DREY: My name is Kay Drey. I'm a citizen from
22 St. Louis. Could you please describe the ingestion and recovery
23 exercises, and also the plume and ingestion demonstration?

24 MS. LAMB: The ingestion and recovery phase of an
25 exercise involves a 0 to 10, -- to 50 mile EPZ around a nuclear

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1 power plant, and basically deals with the ingestion of food
2 products and the possible contamination of those food products
3 and the steps we would take, or the state and local government
4 would take to protect the citizens from ingesting those types of
5 food products. The recovery phase, the recovery reentry and
6 return phase, deals with the identification and the possibility
7 of emergency actions that must be taken to reenter an area that
8 may not have been contaminated, to stay away from an area that
9 may be contaminated, and all the actions that would be required
10 to implement those protective actions for the public.

11 The plume phase of the exercise deals with the
12 emergency part of the exercise, and demonstrates the capability
13 to protect the citizens living within a 0 to 10 mile area of a
14 nuclear power plant, and all those activities leading up to, and
15 protecting, evacuating those people out of harms' way, so that
16 there is no possible threat of their receiving radiological
17 contamination.

18 MR. AUMAN: Any other questions?

19 (Ms. Paice, Standing For Question)

20 MR. AUMAN: Yeah.

21 MS. PAICE: My name is Sandra Paice from Nebraska
22 Emergency Management. And the one question that I have is in the
23 alternative evaluation approach there was nothing mentioned about
24 possibly using other members of state staffing your region. Say,
25 Iowa is in our region, having their staff come as evaluators, as

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1 opposed to using FEMA evaluators all the time. Can you clarify,
2 is that a possibility as an alternative approach to evaluations?

3 MR. BISSELL: Yes. That has been discussed by the
4 committee, and was set up as a separate focus topic, which we're
5 currently working on.

6 MR. AUMAN: Go ahead.

7 MR. MORRIS: I'm Kevin Morris, with Detroit Edison.
8 You mentioned, Mr. Bissell, self-assessments would be, -- could
9 be utilized by government organizations below the county level.
10 I'm curious why you didn't, -- why you're not mentioning them for
11 use at the county or state level? As you know, the NRC relies
12 very heavily on self-assessments in their determination of the
13 adequacy off-site emergency preparedness programs.

14 MR. BISSELL: Well, there were a few comments
15 addressing that very issue. And some of the feedback we received
16 in Kansas City, indicated that resource may be a problem for the
17 state and locals to provide a sort of a self-assessment, and also
18 participate in the exercise. But, that certainly is an issue
19 that's open for discussion.

20 MR. AUMAN: Any other?

21 MR. BISSELL: Jan wants to speak.

22 MR. AUMAN: I'm sorry. Go ahead.

23 MS. LAMB: There's a reason to look at those areas
24 below the county level because of the resources needed to
25 evaluate these locations. But, in the commonwealth, sometimes

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1 the state law demands that municipalities lower than the county
2 level participate in exercises, even though these jurisdictions
3 may not have any lead roles in the response, they are the first
4 responders. So, the state law demands that they have an
5 emergency response plan, and, therefore, it's required that any
6 entity within the emergency response plan be evaluated during
7 that full-scale exercise. That is extremely difficult,
8 especially in Region 3 in Pennsylvania, where many of our
9 evaluation teams exceed seventy people.

10 MR. AUMAN: Any other questions?

11 (No Verbal Response)

12 MR. AUMAN: Okay. Thanks, Bob, Janet and Woodie. Our
13 last Concept Paper will be Delegated State, which will be
14 presented by Steve Borth and Rosemary Hogan.

15 **DELEGATED STATE CONCEPT PAPER**

16 MS. HOGAN: I'm Rosemary Hogan. I'm from NRC
17 Headquarters, the Incident Response Division. And my colleague
18 is Steve Borth from FEMA's Emergency Management Institute.

19 The Delegated State Concept was an idea conceived in
20 our January meeting based on several themes that we received in
21 the Federal Register comments. It is a different concept, but it
22 has a precedence in other federal programs. But, it would still
23 allow FEMA to make the reasonable assurance finding to the NRC.
24 If approved, this paper would need to have many of the details
25 implemented. Unlike the other three Concept Papers, there are

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1 fewer details included in this concept. Delegated state status
2 would be given to a site. The site would be, -- already have
3 their (350) approval as a baseline to apply for this status. The
4 Annual Letter of Certification that currently exists would incur
5 an increased level of importance. It would be the vehicle that
6 FEMA uses to determine whether there was a reasonable assurance
7 finding. States would include all of the details of their
8 program as they have implemented throughout the year in the
9 Annual Letter of Certification. FEMA could provide some limited
10 supplemental verification of the information provided in that
11 letter.

12 There would be an application process for any state or
13 site that would wish to become a delegated state. This would be,
14 -- include a request from the governor or his designee, including
15 the request for the application and including all of the
16 information that would be required. The program would be
17 voluntary. The State would continue to conduct exercises. The
18 Annual Letter of Certification would be a standardized format
19 that does need to be developed. It could include information
20 that already exists. It would include the Exercise Report and
21 corrective actions, and any plan updates that had been
22 implemented throughout that year. The Annual Letter of
23 Certification would incur some increased importance because it
24 would be the vehicle that FEMA uses to make their overall
25 finding. FEMA would rate each function in the letter and

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1 determine whether it was acceptable; acceptable with
2 recommendations for improvement; or unacceptable. Based on those
3 functional assessments FEMA could make an overall finding that
4 reasonable assurance exists; reasonable assurance exists, but the
5 program does need improvement; reasonable assurance does not
6 exist. Then the State would have to provide a corrective action
7 program to improve those areas. FEMA could monitor those by
8 providing supplemental visits. If those actions were not
9 corrected, FEMA could lose, -- could take away the delegated
10 state status.

11 One of the major functional differences in this concept
12 is that the states would do their own evaluation of exercises.
13 As designed, this would include their evaluators that would be
14 trained to, -- under a proposed program, and meeting certain
15 criteria. They could be evaluators from state, local or others,
16 as the State designed in their program. And FEMA could provide
17 some supplemental evaluators if requested by the state.

18 Another function of the Delegated State Program would
19 be the credit policy. Now, that was discussed in a previous
20 paper, but this credit policy could also be applied to the
21 Delegated State Concept. And that would be a situation where the
22 state could determine that an actual event could qualify for some
23 credit, and they would describe that in their Annual Letter of
24 Certification, to be reviewed by FEMA. If FEMA thought that
25 there were any problems with the use of that credit policy they

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1 could go back to the state and request some information, or some
2 supplemental actions.

3 In addition to reviewing the Annual Letter of
4 Certification, if there was any information in that that FEMA had
5 a question about, they could also go out and request some
6 additional information from the state.

7 The periodic verifications that would be, -- result
8 from these reviews of specific aspects of the program could be
9 increased, if there was some concern about the state performance,
10 or decreased if there was good performance.

11 One of the details that would have to be addressed in
12 this, -- if this concept were recommended, would be the financial
13 details. This could be a situation where the cost would increase
14 to the states, and, therefore, the funding of that would be of
15 great concern. FEMA could possibly pass through funding that it
16 receives; utilities could provide direct funding to the states;
17 the states could fund as a whole program on their own; or there
18 could be some other combinations or options.

19 Because this program would be a very new concept, the
20 committee believed that a pilot program would be appropriate.
21 So, a few states could be designated as pilot states and the
22 program would be implemented in a phased-in program. Any issues
23 or details that were addressed in this phased-in program could be
24 corrected in the implementation phase, if this became a full
25 fledged program.

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1 States would not have to become a delegated state. If
2 for whatever reason states felt that they were not an appropriate
3 candidate, they could remain as a non-delegated state in the
4 current REP Program, as revised by other aspects of this
5 committee. The negotiated extent of play for exercises would
6 continue, and the standard letter, -- the Annual Letter of
7 Certification, as may be revised by this strategic review, would
8 be used.

9 Some advantages to states that choose to be a delegated
10 state, of course, one of the themes in the Federal Register
11 comments was independence and flexibility, and the states know
12 better how to implement their program. This Delegated State
13 Concept would provide those opportunities for the state.

14 Procedures and the methods that a state would use would be their
15 own. That could provide some increased ownership of the program.

16 It could be less costly, depending on how a state implements the
17 program. The standardized Letter of Certification would have an
18 increased level of importance, and there could be some
19 streamlining on the part of FEMA, because fewer staff would be
20 needed to evaluate exercises and to monitor the program.

21 There's some potential disadvantages, too. Because
22 this program is new, the costs are unknown. The perception of
23 self-evaluation could be, -- mean that the program could be
24 perceived as less effective. The current resources either in
25 the, -- in the state could be insufficient. And both FEMA and

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1 state staff would certainly have changing roles, which could
2 provide some growing pains. The FEMA staff in the regions would
3 have to conduct two programs, the Delegated State Program and a
4 Revised REP, -- traditional REP Program.

5 So, that's all I have. If there are any further
6 questions?

7 MR. AUMAN: Thank you, Rosemary. Do we have any
8 questions?

9 (Mr. Rospenda, Standing For Question)

10 MR. AUMAN: Yes, please.

11 MR. ROSPENDA: Bob Rospenda, Argonne National
12 Laboratory. FEMA is moving towards this Partners in Preparedness
13 Program with the states and local governments, and apparently
14 this will require less oversight by FEMA. Due to the regulatory
15 nature of FEMA's REP Program, does FEMA feel that there are any
16 special policies or methods that it will have to undertake to
17 still be able to make determinations of reasonable assurance for
18 the public safety?

19 MR. BORTH: Insofar as we've examined the issue of
20 changes to regulations or other kinds of policy-type documents,
21 the foundation of this program is such that we believe it could
22 enable FEMA to still provide those reasonable assurance findings
23 to the NRC, just actually, through a little different means of
24 gathering that data. Currently, as you all are well aware, our
25 primary method of doing so is through exercise evaluation. And

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1 the way this concept is presented, the exercise evaluation
2 becomes less of a factor as far as FEMA's actual participation,
3 and some of those other areas which have not received too much
4 focus on in recent years, become a little more important. And
5 those would be reviewed through the Annual Letter of
6 Certification and supplemental verifications. So, I think we, --
7 as we've developed this concept, we feel that it would still
8 enable FEMA to provide those reasonable assurance documents, or
9 findings.

10 MR. AUMAN: Any other questions?

11 (No Verbal Response)

12 MR. AUMAN: In that case, we're well ahead of
13 schedule. What we're going to do is we're going to take a break
14 for fifteen minutes. When we come back the, -- there will be a
15 panel member from each of the four Concept Papers up here, and
16 we'll begin taking your comments and responses at that time.
17 It's now 10:30, we'll begin at 10:45. There is coffee available
18 downstairs, and, of course, the bathrooms are right across the
19 lobby out there. Thank you.

20 (Whereupon, at 10:30 a.m., the meeting was recessed, to
21 reconvene this same day at 10:50 a.m.)

22 MR. AUMAN: If I could ask people to start taking
23 their seats, we'll get started with the responses then.

24 (Pause)

25 **PUBLIC COMMENT**

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1 MR. AUMAN: Okay. We have panelists from each of the
2 four Concept Papers here, -- and up front. We'll take your
3 prepared comments now. Again, we would ask you, again, please
4 preface your comments with your name and your affiliation. We
5 would ask you to again, limit your comments to five minutes, but
6 if you want to come back again, that's fine, too; we have plenty
7 of time to listen to comments. So, time is really not an issue
8 today. And, again, we would ask you to come up to the
9 microphone, for the Recorder's sake, as well as your colleagues
10 and the panelist members as well. So, we are ready to hear your
11 comments. Who would like to start?

12 MR. BLACKMON: My name is Terry Blackmon. I'm the
13 Emergency Preparedness Director for Off-Site Preparedness of
14 Commonwealth Edison.

15 Com-Ed stresses that as the process proceeds it is
16 imperative to assure that 44 CFR 350 approval is retained for all
17 sites currently having approval. No changes to the program
18 should invalidate or possibly challenge the existing approvals.
19 Exercise streamlining is the area where there is most to be
20 gained. An outcome-based process should be emphasized. Plants
21 without 44 CFR 350 approval should be required to meet all
22 objectives, with a finding that public health and safety can be
23 assured. Plants with 44 CFR 350 approval should be allowed
24 maximum flexibility and should be evaluated from the lessons
25 learned, contribute to assurance of the public health and safety.

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1
2 The focus on radiological functions can be accomplished
3 as part of an integrated program. The Exercise Evaluation Manual
4 should assess only those components that are unique to
5 radiological emergency response, or have a direct impact on
6 public health and safety. Components that are generic to all-
7 hazards emergency preparedness need not be continually
8 reassessed.

9 The partnership should be the basis for the findings of
10 reasonable assurance of public health and safety. FEMA has
11 chosen to evaluate exercises of a response capability. It is
12 suggested that a review and audit of activities detailed in the
13 Annual Letter of Certification be used as the basis for ongoing
14 claims of reasonable assurance. The basis for withdrawal of 44
15 CFR 350 approval should be made on an overall program assessment,
16 not on the result of a single exercise.

17 Delegated State should be delayed for consideration
18 until more effective priorities can be implemented.

19 Most of the issues revolving around the REP Program can
20 be resolved with very basic changes. First, either make the 44
21 CFR 350 approval process meaningful, or eliminate the process.

22 Second, evaluation of the program should be based on
23 the sixteen criteria of the NuReg-0654. Findings that have no
24 direct basis in the NuReg criteria should be presented as
25 improvements only.

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1 Third, develop an in-depth evaluator certification
2 program. The evaluator certification program should focus on
3 observation skills. The certification program should concentrate
4 on the sixteen criteria and not on the detailed checklist.
5 Evaluators should be taught to focus heavily on local plan and
6 procedure reviews in preparation for evaluation.

7 Four, allow maximum flexibility in the selection of
8 exercise objectives. Objectives should be selected based on what
9 is to be learned from the exercise, rather than demonstration of
10 known capabilities.

11 The following are a variety of events that can provide
12 positive learning experiences without resulting in negative
13 training: fast-breaking scenario, unusual event or alert, with a
14 release; site emergency, with release, or no release, and
15 recovery; general emergency with protective action
16 recommendations and no release; plant events combined with
17 earthquakes and tornados where off-site has the greater damage.
18 A key evaluation criterion should be, as the lesson's learned,
19 improve the capability to provide or assure public health and
20 safety.

21 Fifth, eliminate fifteen minute criteria as part of the
22 evaluations. In the Statements of Consideration, Part 50, dated
23 August 19, 1980, the NRC stated, *"Moreover, there may never be an*
24 *accident requiring use of the fifteen minute notification*
25 *capabilities"*. The industry has no problem with the fifteen

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1 minute criteria as a requirement of capability, it is concerned
2 about its application to the exercise evaluation process. When
3 the fifteen minute criteria is applied to non- fastbreaking
4 scenarios, it generates confusion of a realistic time frame, it
5 generates errors of public information, which could be more
6 detrimental than any delay in notification, and adds to negative
7 training. It is clear from the Statements of Consideration that
8 the fifteen minute capability should have limited application in
9 the exercise evaluation process.

10 Six, require all applicable objectives to be
11 demonstrated at some site within the six year cycle. A few
12 counties and a number of states are impacted by more than one
13 plan. These entities should have the flexibility to select as
14 many or as few objectives as needed to meet the above-stated
15 requirement. If the decision-making process works at one site,
16 there's no reason why the same process should not work at another
17 site.

18 Seven, eliminate objectives that are not unique to REP.
19 The requirement for a medical capability is not a REP- unique
20 requirement. With the concerns for nuclear terrorism, the
21 program for handling radiologically contaminated injured should
22 be broader based.

23 Eight, Review REP-14 and 15 against NuReg-0654,
24 FEMA/REP-1 criteria. For example, the items listed on the
25 Performance Review 3.2, page 3-1 of FEMA/REP-15 has no valid

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1 reference in the NuReg.

2 Nine, combine exercise objectives. That's already been
3 discussed.

4 Technical advice to FEMA, -- Item Eleven. I'm sorry,
5 Item Ten. Eliminate as many points of review as it is reasonable
6 to do. Many of the points of review are unnecessary. For
7 example, Point of Review 1.5 has no basis in NuReg. The issue is
8 whether or not personnel can be notified, not how; mobilized, not
9 how.

10 Eleven, technical advice to FEMA should come from the
11 appropriate federal agencies, not from contractors. FEMA should
12 revitalize the Regional Assistance Committees and eliminate
13 reliance on contractors. Contractors have a self-serving
14 motivation behind their advice and evaluations. The individuals
15 provided by RAC members for evaluators, should not be contractors
16 to those agencies. Fully using the RAC is another way for
17 federal responders to remain familiar with how states, locals and
18 utilities will respond. Federal response will be enhanced by the
19 knowledge gained and maintained through observation by Regional
20 Assistance Committee members. Thank you.

21 MR. AUMAN: Thank you.

22 (Mr. Seebart, Standing For Question)

23 MR. AUMAN: Please, sir.

24 MR. SEEBART: Good morning. My name is Dave Seebart,
25 and I'm representing Wisconsin Public Service Corporation. I've

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1 been the Emergency Preparedness Supervisor at the Kewaunee
2 Nuclear Power Plant since 1981. I'd like to thank you for the
3 opportunity to speak this morning and recognize you for your
4 ability to recognize a need for change, for the effort you've put
5 into it so far, and for taking on the challenges that, -- yet to
6 be faced.

7 I've followed this process since the beginning and the
8 one thing that's most gratifying to me has been the general unity
9 of purpose between state, county and utilities. Yes, there are
10 variations across the nation. There are variations in capability
11 and knowledge level, but we seem to come back to the same common
12 themes. And I think you've identified and are addressing those,
13 that should be commended.

14 In my view, there are about three important areas that
15 need to be focused on. First of all, is, we need a joint FEMA
16 and NRC effort on an exercise of realism, realism of scenarios.
17 Up to this point, we have used very conservative doses estimate
18 programs to generate dose numbers in the public for emergency
19 response. Many times those are very high compared to the real
20 release that could be generated from a plant. And often, and
21 very typically, when field teams bring their more realistic
22 numbers in for assessment, they're lower than those projections.
23 So, that the high numbers are what are heard first, and that's
24 what the public is exposed to. We need to bring radiological
25 release values into reason.

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1 We do have the capability plant by plant, conditions to
2 declare emergencies where that would force an evacuation without
3 radiological numbers. We've done that in the past and we've
4 demonstrated that evacuation capability. We have the means,
5 without putting up excessively high numbers. Realistic
6 radiological monitoring and assessment can be done and
7 demonstrated with lower radiological numbers. As a matter of
8 fact, we feel it's more difficult to demonstrate that there is no
9 radiological threat, than there is a major threat. So, ability
10 to show that capability is there with realistic release numbers.

11
12 Compliance-based exercises cause conflict, and gives us
13 false sense of response times for exercises, in that our
14 operators are licensed and personally accountable for health and
15 safety of the public. Their goal is to put the plant in a safe
16 shutdown condition. They're held personally responsible for
17 doing that, and that is their goal. Many times in compliance-
18 based exercises we have to hold up that process to allow the
19 state and counties to demonstrate their objectives. This is not
20 good training for our operators, nor is it a realistic portrayal
21 of how the off-site agencies would have to respond. Slow
22 responses, slow building in emergency situations; I fully believe
23 in my experience, that the operators will prevent a health threat
24 to the public, put the plant in a safe condition, safe shutdown,
25 and prevent the need for general emergency in a slow-moving

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1 event. That doesn't mean that fastbreaking, Act of God situation
2 can't happen. In that case, we have to be ready to deal with it
3 in the time frame that it dictates, not us. We do have in place
4 predesignated protective action recommendations for the
5 fastbreaking event. We should concentrate our time on our
6 confidence level in those protective action guidelines, and in
7 the confidence in implementing in a timely manner for that
8 fastbreaking event.

9 Secondly, looking at the skill and professionalism of
10 hundreds of volunteers in the state and county levels, -- yes,
11 there's a lot of response, -- emergency response professionals
12 who participate, but, there are also hundreds of volunteers who
13 take part. Over the last decade and a half, these people have
14 been increasing their skill and knowledge to a very high level.
15 They are stakeholders in their communities. They want to do a
16 good job. They want to be able to say honestly, *"We can protect*
17 *our friends and neighbors in our community"*. And many times, in
18 the area of self-assessment, they're more critical of themselves
19 than any outside observer could be. So, I think we have the
20 potential where we can, to use self-assessment, allow the people
21 to monitor themselves and audit their results to ensure that that
22 general level of preparedness is there.

23 The third area is our ability to implement self-
24 assessment. I hope you realize the overpowering benefit of self-
25 assessment that's out there for positive change. Knowledgeable

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1 assessors coming in from a regional basis of peers, bring their
2 knowledge to the community they talk to, just as you have in the
3 past. The opposite side of that is the innovation they see by
4 observation came back to their communities. So, there is a win-
5 win. Yes, they can assess and help evaluate, they bring their
6 knowledge, but anything they see, they take back to their own
7 communities and implement. So, the benefits are far reaching to
8 set up a mechanism to allow them to do it.

9 Finally, the point I'd like to make is, the FEMA/NRC
10 partnership, we need to exist in this whole review process and
11 change. For years the utility, -- when we conduct an exercise
12 it's viewed as a test, a test of our capabilities. And our
13 operators take that seriously. A test to them, is do everything
14 right, do it as promptly and effectively as possible, put the
15 plant in safe shutdown condition and not have the release of
16 radioactive material. State and counties, because of compliance-
17 based exercises have had to say, *"Please, give us an hour or an*
18 *hour and a half, to show this function"*. It makes it very
19 difficult to generate a realistic scenario when we have those two
20 conflicting views.

21 So, as you deliberate over your findings and look for
22 ways and methodologies, my request to you is that the FEMA/NRC
23 partnership is as strong as possible, so that our ability to
24 generate scenarios and exercise situations that the plant and the
25 off-site agencies can respond to, are as realistic as possible,

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1 and we prepare ourself for the real event. Thank you very much.

2 MR. AUMAN: Thank you. Next person.

3 MR. YAROSZ: Good morning. My name is Billy Yarosz.
4 I'm a Supervisor of Emergency Planning at the Power Station at
5 Illinois Power Company. I would like to echo a couple of things
6 that Dave said. I think you should be commended for the
7 undertaking that you're doing here today, as far as the FEMA
8 review is concerned. I'd also, -- a lot of my comments you've
9 already addressed, you've already commented on those, and some of
10 my colleagues have already commented on, but I think it should be
11 emphasized.

12 We agree that FEMA should be looking at the reasonable
13 assurance of the health and safety of the general public as an
14 objective. But we feel that in the past it's been a one-way
15 street, and then looking strictly at the exercise to make that
16 determination. We feel it should be a two-step process, and it
17 should be compliance with the regulation, as well as performance
18 of the emergency response organization. Compliance with the
19 regulations can be done through the (350) approval process,
20 through plan revisions, through the Annual Letter of
21 Certification of certification, which I think you're already
22 doing, through audits and inspections and through self-
23 assessments.

24 As far as the performance of the emergency response
25 organization goes, that will still be through the graded

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1 exercises performed every other year. However, we feel that a
2 lot of the non-radiological aspects should be taken out of those
3 whenever possible. Also, the use of less evaluators would be
4 beneficial, however, those evaluators should be better trained,
5 and they should be results-oriented, instead of compliance-
6 oriented. And, also, the use of a realistic or more probable
7 events, emphasizing on past weaknesses that were identified by
8 maybe a more previous exercise where we learned how to address
9 these.

10 And as far as Concept Paper goes, we feel that there
11 are really only two issues here, and that two of the Concept
12 Papers can be combined into one. The Exercise Streamlining and
13 the REP versus the all-hazard, really is one issue. And then the
14 Partnership and Delegated States, is really another issue,
15 therefore, the two issues will be addressed. We feel that the
16 Exercise Streamlining should be the one that is focused on first,
17 and then after any actions or determinations from that, then you
18 should focus again on the Partnership and the REP.

19 Finally, as far as the exercise deficiencies go, we
20 feel that there are some objectives that can be combined or
21 consolidated. We could remove some of the non-radiological
22 objectives. The medical objectives probably shouldn't be as
23 frequent as every exercise. And, again, the use of better
24 screening evaluators, again, looking at results; did the
25 participants adequately protect the health and safety of the

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1 public? And that's what we're looking at. Thank you.

2 MR. AUMAN: Thank you. Next person.

3 MS. DREY: My name is Kay Drey. I'm from St. Louis.

4 I'm not clear what the purpose of today's public meeting is.

5 First, I would like to ask a question. Can somebody tell me the
6 date when the public notice of the San Francisco meeting and this
7 St. Louis meeting, and the D.C. meeting tomorrow, when the notice
8 appeared in the Federal Register?

9 MR. AUMAN: Does somebody have a copy of it?

10 MS. MARTIN: November 18th.

11 MR. AUMAN: I'm sorry?

12 MS. MARTIN: November 18th.

13 MR. AUMAN: November 18th.

14 MS. DREY: November 18th. I know that the advisory
15 went out the day after Thanksgiving, which was just this past
16 Friday. Most citizens do not have access to the Federal
17 Register, we don't read it on a regular basis. It's hardly, I
18 think, an adequate notice for a public hearing, especially if
19 there are only three in the whole country.

20 The St. Louis organization, with which I am associated,
21 the Coalition for the Environment, was an intervenor in the
22 Calloway Nuclear Power Plant licensing procedure before the NRC,
23 and has been a demonstrated stakeholder for twenty-five years,
24 yet the Coalition For The Environment was not notified of today's
25 meeting. I am also a Board member of the Nuclear Information and

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1 Resource Service in Washington, D.C., and that group also was not
2 informed of these hearings, including the one tomorrow. I
3 learned of today's meeting only because one of our public radio
4 reporters phoned me two days ago, when he, too, first learned of
5 this meeting. And it seems to me, -- it looks like most of the
6 people in the audience today seem to be here from various midwest
7 electric utility companies. I assume they were notified longer
8 ago than just two days. But, I just want to make the point that
9 I think the citizen input, -- there's no way to hope to have
10 citizen input, if the citizens aren't informed of a meeting.

11 I would also like to say that I hope the Federal
12 Emergency Management Agency, FEMA, will maintain an active
13 presence in the oversight of the emergency response plans at our
14 commercial nuclear power plants. I know that FEMA found some
15 deficiencies at the Union Electric drill in August, and as the
16 plants get older and the equipment is older, and a
17 lot, -- I think a lot more, -- the hazard increases. And I think
18 we need more federal supervision and oversight, not less.

19 I think that volunteers can do a great deal, but I
20 think they are limited, and even the professional people have
21 some, I think, misconceptions about radiation. When we were
22 concerned here in St. Louis, about the Three-Mile Island fuel
23 that was shipped through St. Louis, about two dozen shipments by
24 train, and I realize you're talking just about power plants that
25 are in one place, we, -- I spoke with a lot of people. At that

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1 time we were responsible as County officials here in St. Louis
2 County, for radioactive accidents. And I was given their Fire
3 Services Radiological Emergency Response Manual, and on page 28
4 it says,

5 *"The exclusion zone is where the radioactive*
6 *materials are located, or suspected to be*
7 *located. The buffer zone is a work area*
8 *which may become contaminated as the*
9 *operations continue" .*

10 Operations, meaning for evacuation.

11 *"The cold zone is outside the operational*
12 *area and is definitely non-contaminated.*
13 *These zones may be delineated in a number of*
14 *ways. The most satisfactory method is to*
15 *use barriers. However, if rope is not*
16 *immediately available, an imaginary line can*
17 *be used, as long as everyone understands*
18 *what it is and what it means."*

19 And I have experiences also at that time when I called our County
20 Emergency Management Office and, -- to find, -- I just asked a
21 simple question, *"What does the Geiger counter have to read for*
22 *you to make a decision that you will evacuate an area?"* And he
23 said, *"Well, we'll have to wait until the health physicist gets*
24 *to the scene"*. So, I think we are, -- I think as citizens we
25 have a lot of legitimate questions and concerns. I have worked

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1 with the Nuclear Regulatory Commission for a long time, and with
2 the Department of Energy, and I feel they're trying to do a good
3 job, but I also feel that as citizens maybe we have a little more
4 comfort in an agency that's not promoting nuclear facilities. If
5 there were no nuclear engines, there would be no nuclear
6 engineers, and so forth. So, you are all responsible for
7 emergency management, and I like the comfort of having this
8 additional layer. Thank you.

9 MR. AUMAN: Thank you very much. Any other comments?

10 (No Verbal Response)

11 MR. AUMAN: No? If we're done, I'll turn it back over
12 to Anne Martin. Yes, maybe we do have another one.

13 MR. BLACKMON: A couple of additional comments. As
14 you were talking today and going through this, one of the things
15 that strikes me, if I were FEMA, looking at a bigger picture and
16 a longer term, FEMA needs to look at the total exercise program.
17 You know, some of our counties are involved with has-been
18 exercises and drills, SESA (phonetic), a number of different
19 requirements. They come together on
20 a, -- sometimes very close together, and taxes the same resources
21 over and over again. And I think one of the things that you need
22 to look at long term, beyond the REP Strategic Review, is a total
23 exercise program for state and counties, so that you can
24 integrate all the exercising and drills that's done and make sure
25 that you've got across the board capability, regardless of what

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1 the disaster is. And that that's being evaluated and drilled in
2 a most efficient manner. Because right now you've got different
3 programs that butt heads with one another for the same
4 scheduling, -- I mean, for the same resources at times. And I
5 think that's a bigger picture to look than just this program.

6 I just came from an exercise yesterday at Zion
7 (phonetic); one thing that really stood out to me was just to
8 emphasize the, -- what I believe is some of the uselessness of
9 the check lists that are currently being used. The evaluator
10 went over, near the end of the exercise, and asked about the
11 emergency power source for the State Emergency Operation Center.
12 And since they, -- this is the second exercise in the same year,
13 I'm sure that question was asked at the previous exercise. The
14 building hasn't changed. It hasn't changed for a number of
15 years. So, unless you have some change like that, you don't need
16 to ask some of those basic questions over and over again. And I
17 think those items are very easily deleted and shouldn't take
18 nothing away from the health and safety of the public just
19 because the process becomes a little more efficient.

20 MR. AUMAN: Thank you. Do you have his name and
21 affiliation?

22 THE COURT REPORTER: (No verbal response.)

23 MR. AUMAN: I'm sorry?

24 THE COURT REPORTER: No, I was going to, --

25 MR. AUMAN: I'm sorry. Could I have your name and

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1 affiliation again, for our recorder. Just make sure we capture
2 that.

3 MR. BLACKMON: Terry Blackmon, Commonwealth Edison.

4 MR. AUMAN: Thanks. Any other last thoughts?

5 (No Verbal Response)

6 MR. AUMAN: No? Anne.

7 MS. MARTIN: Thank you, Rick. And I'd like to thank
8 each one of you for joining us today. I would like to note that
9 the Federal Register notice of the meeting was given on November
10 the 18th. Also, on our FEMA home page, our FEMA web site, the
11 REP home page; if you're not familiar with that, there's a large
12 sign as you came into the building, giving you the specific
13 address. In fact, -- no, it's not in this slide, but it is on
14 the, -- at the front door, giving the specific web site address.

15 This announcement was there at the same time that the
16 arrangements were made for the meeting, and all of the comments
17 from this meeting, as I mentioned earlier, from all the public
18 meetings, will be posted on the web site.

19 In closing, I would like to thank John Miller and his
20 staff, the staff of Region 7, for hosting this meeting, for
21 making all of the arrangements. I also would like to show
22 appreciation to our RAC Chairs, Woodie Curtis, Larry Earp and Bob
23 Bissell, for the midwest territory here. I would also ask if you
24 have not signed in, we have sign-in sheets on the table at the
25 back of the room, so if you would, please, be sure and give us

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1 your name and affiliation. Are you raising your hand?

2 COMMENT FROM THE FLOOR: Yes. Will we be able to get
3 copies of the attendance sign-in sheets, -- the attendance list?

4 MS. MARTIN: We can probably put that on a web site,
5 since we don't have specific addresses. Yes ma'am.

6 COMMENT FROM THE FLOOR: Are we also going to be able
7 to get a copy of the slides? They went so fast I couldn't write
8 fast enough.

9 MS. MARTIN: Okay. And for the audience, let me
10 repeat. Andrea, your question was, copies of the sign-in sheets,
11 and your question is, --

12 COMMENT FROM THE FLOOR: Copy of the slides.

13 MS. MARTIN: -- copy of the slides. I beg your
14 pardon. They are going to be on the web site.

15 COMMENT FROM THE FLOOR: They already are.

16 MS. MARTIN: They already are on the web site, but we
17 did not make any provisions to make hard copies. But they are at
18 the FEMA web site, and, again, that address, -- I
19 can, -- you can see one of our staff here may give you the
20 specific http address.

21 COMMENT FROM THE FLOOR: It's on the catalogue.

22 MS. MARTIN: And it's on the easel at the front door.
23 Any other questions?

24 (No Verbal Response)

25 MS. MARTIN: Would the Steering Committee go towards

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1 the exit sign there (indicating).

2 (Parties Comply)

3 MS. MARTIN: Last opportunity. Also, while the
4 Steering Committee is moving towards the door, I will point out
5 this viewgraph is saying that today or this week, these public
6 meetings are not the last opportunity to make comments. If you
7 would, if you have any written comments, if you have an
8 opportunity to think more about what you heard today and would
9 like to make some written comments on them, send written comments
10 to this address (indicating). We're asking that they come in
11 before January the 1st, because of the, -- as you may have noted
12 in the overview briefing, our intent is to propose preliminary
13 recommendations in March. So, if you get them in before January,
14 we'll have an opportunity to consider those in our first meeting
15 for preliminary recommendations. Okay. Phil, without my glasses
16 I'm going to attempt this, but if you have your address
17 and, -- or if you have your paper and pencil handy it's
18 <http://www.fema.gov/pte/rep>, R-E-P. And that is where all the
19 proceedings of all the meetings will be posted. Also, any new
20 dates, any new events, they are posted as they happen. So, that
21 is the most direct and fastest route to get information.

22 I would also note, that we learned, -- this is
23 a, -- I won't say I'm computer illiterate, but, I'm not very
24 knowledgeable, and I understand that a peculiarity of the web
25 site is that if you check it today and you see certain items, and

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1 you check it tomorrow, it may look like it has not changed, but
2 in actuality it has. There is refresh function, so it's not
3 readily apparent if there has been changes from week to week.
4 So, if you would, please, be sure to go through whatever process
5 is noted, that refresh function, to get the very latest news.

6 On that, again, I thank you for being with us today,
7 and that concludes our public meeting for the midwest
8 territories. Thank you.

9 (Whereupon, at 11:30 a.m., the meeting was concluded.)

10 //

1 State of Missouri)
2) SS.
3 City of St. Louis)
4

5 I, DEBORAH CARTER, a Notary Public in and for the State
6 of Missouri, duly commissioned, qualified and authorized to
7 administer oaths and to certify public hearings and other legal
8 proceedings, do hereby certify that the foregoing is a correct
9 transcript from the electronic sound recording of the proceedings
10 in the matter of the REP Program Strategic Review, At-Large
11 Stakeholders Meeting, held December 4, 1997, for the Federal
12 Emergency Management Agency; Preparedness, Training and Exercises
13 Division.

14 I further certify that I am not an employee of the Federal
15 Emergency Management Agency nor related to nor interested in any
16 of the parties to whom this hearing is addressed.

17 Witness my hand and notarial seal at
18 St. Louis, Missouri, this _____ day of
19 _____, 1997.

20 My Commission expires March 21, 1999

21

22

23 _____
24 Notary Public in and for the
State of Missouri

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I-N-D-E-X

	PAGE NO.
Welcome and Overview	3
Partnership Concept Paper	15
Sharon Stoffel	
Mary Lynne Miller	
Radiological Focus Concept Paper	25
Falk Kantor	
Tom Essig	
Bill McNutt	
Marcus Wyche	
Exercise Streamlining Concept Paper	35
Janet Lamb	
Woodie Curtis	
Bob Bissell	
Delegated State Concept Paper	48
Rosemary Hogan	
Steve Borth	
Public Comment	
54	
Terry Blackmon	
Emergency Preparedness Director	
Commonwealth Edison	
55	
Dave Seebart	
Emergency Preparedness Supervisor	
Wisconsin Public Service Corporation	
60	
William Yarosz	
Supervisor of Emergency Planning	
Illinois Power	

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Kay Drey

Citizen - St. Louis, Missouri

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**FEDERAL EMERGENCY MANAGEMENT AGENCY
PREPAREDNESS, TRAINING AND EXERCISES DIVISION**

REP PROGRAM STRATEGIC REVIEW

AT-LARGE STAKEHOLDERS MEETING

ST. LOUIS, MISSOURI

DECEMBER 4, 1997

HOSTS

John Miller
FEMA Regional Director - Region 7

* * *

D. Anne Martin
FEMA Deputy Director - Exercise Division

* * *

Rick Auman
Human Technologies, Incorporated